

Paula A. Barran, OSB No. 803974
pbarran@barran.com
Shayda Zaerpoor Le, OSB No. 121547
sle@barran.com
Donovan L. Bonner, OSB No. 181929
dbonner@barran.com
Barran Liebman LLP
601 SW Second Avenue
Suite 2300
Portland, Oregon 97204-3159
Telephone: (503) 228-0500
Facsimile No.: (503) 274-1212
Attorneys for Defendants
University of Oregon and Hal Sadofsky

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

JENNIFER JOY FREYD,

Case No.: 6:17-cv-448-MC

Plaintiff,

v.

UNIVERSITY OF OREGON, MICHAEL H.
SCHILL and HAL SADOFSKY,

**DECLARATION OF PAULA A.
BARRAN IN SUPPORT OF
DEFENDANTS UNIVERSITY OF
OREGON AND HAL SADOFSKY'S
BILL OF COSTS**

Defendants.

I, Paula A. Barran, declare as follows:

1. I am one of the attorneys representing the Defendants University of Oregon and Hal Sadofsky in the above-captioned matter. I have been personally involved in this litigation from the outset.

2. Attached as Exhibits A and B are a true and correct copies of the February 26, 2018 invoice from Aufdermauer Pearce Court Reporting, Inc. and the July 19, 2018 invoice from Beovitch, Walter & Friend, Inc. for services related to transcripts of plaintiff's depositions taken in this case.

Page 1 – DECLARATION OF PAULA A. BARRAN IN SUPPORT OF DEFENDANTS
UNIVERSITY OF OREGON AND HAL SADOFSKY'S BILL OF COSTS

3. Attached as Exhibits C – I are true and correct copies of invoices from CC Reporting and Videoconferencing and Northwestern Court Reporter for transcripts of the depositions of Dr. Hal Sadofsky, President Michael Schill, Dr. Scott Coltrane, Dr. Andrew Marcus, Dr. Ulrich Mayr, Dr. Sanjay Srivastava, and Jody Shipper which were taken by plaintiff.

4. Attached as Exhibit J is a true and correct copy of an invoice from Streamline Imaging, a vendor which provided defendant with support tools and services to manage discovery. Plaintiff specifically sought production of emails in native format which made the services performed by Streamline Imaging reasonably necessary.

5. Attached as Exhibit K is a true and correct copy of a summary of documents produced by this law firm on behalf of defendants in response to plaintiff's discovery requests. Defendants request costs at \$0.10 per page which reflects what external vendors typically charge and what we understand to be a reasonable per page charge.

I declare under penalty of perjury that the foregoing is true and correct.

DATED this 15th day of May, 2019.

s/Paula A. Barran

Paula A. Barran

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of May, 2019, I served the foregoing
**DECLARATION OF PAULA A. BARRAN IN SUPPORT OF DEFENDANTS
UNIVERSITY OF OREGON AND HAL SADOFSKY'S BILL OF COSTS** on the following
parties at the following addresses:

Jennifer J. Middleton
Caitlin V. Mitchell
Johnson Johnson Lucas & Middleton, PC
975 Oak Street, Suite 1050
Eugene, OR 97401-3124
jmiddleton@justicelawyers.com
cmitchell@justicelawyers.com
Attorneys for Plaintiff

Whitney Stark
Albies & Stark, LLC
210 SW Morrison Street, Suite 400
Portland, OR 97204-3189
whitney@albiesstark.com
Attorneys for Plaintiff

Stephen F. English
Cody Weston
Nathan R. Morales
Perkins Coie LLP
1120 N.W. Couch Street, 10th Floor
Portland, OR 97209-4128
senglish@perkinscoie.com
cweston@perkinscoie.com
nmorales@perkinscoie.com
Attorneys for Defendant Michael H. Schill

by the following indicated method or methods set forth below:

- ☒ **Electronic Filing using the Court's ECF System**
- ☐ **First-class mail, postage prepaid**
- ☐ **Hand-delivery**
- ☐ **Overnight courier, delivery prepaid**
- ☐ **E-mail**

s/Paula A. Barran

Paula A. Barran
Shayda Zaerpoor Le
Donovan L. Bonner